

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
BEAUMONT DIVISION**

REJI SAMUEL, ATHA MOHAMMAD ABDUL,)
KESAVARAO BUNDANKAYALA, RAJU DIVAKARAN,)
BIJU PERUMPILLY GEORGE, KRISHNA GONTHINA,)
NAYAPPULLI JAYACHANDRAN, GALLA VENKATA)
RAMA KRISHNA, SAMUEL JOSE KUMRUMTHODATHIL,)
LOHITHAKSHAN MADAMPET, JOHNY MANDY MATHAI,)
BELTHAZAR PETER, MOHANAN BALAKRISHNA PILLAI,)
SANTHOSH KUMAR RAJENDRAN PILLAI, ABY)
KARICKATHARA RAJU, SUMESH)
PORAMBATHUPARAMBIL SUBRAMANIAN, and)
CHANDRAN SHAJU THANISSERY,)

Plaintiffs,

v.

SIGNAL INTERNATIONAL L.L.C., SIGNAL)
INTERNATIONAL, INC., SIGNAL INTERNATIONAL)
TEXAS, G.P., SIGNAL INTERNATIONAL TEXAS, L.P.,)
MALVERN C. BURNETT, GULF COAST IMMIGRATION)
LAW CENTER, L.L.C., LAW OFFICES OF MALVERN C.)
BURNETT, A.P.C., GLOBAL RESOURCES, INC., MICHAEL)
POL, SACHIN DEWAN, and DEWAN CONSULTANTS PVT.)
LTD. (a/k/a MEDTECH CONSULTANTS),)

Defendants.

CIVIL ACTION NO.:
1:13-cv-00323-MAC-ZJH

**PLAINTIFFS' NOTICE OF SUPPLEMENTAL AUTHORITY IN
SUPPORT OF MOTION TO EXCLUDE TESTIMONY AND
STRIKE THE EXPERT REPORT OF RONALD J. MCALEAR**

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Remaining Counsel Listed on Signature Page

Attorneys for Plaintiffs

Plaintiffs respectfully file this notice submitting for consideration in connection with their Motion to Exclude Testimony and Strike the Expert Report of Ronald J. McAlear [ECF No. 156] (the “Motion”), which is currently pending before the Court, the attached recent decision from the related *David* case. *See* Order, *David v. Signal Int’l, LLC*, No. 2:08-cv-01220-SM-DEK (E.D. La. Jan. 5, 2015), ECF No. 2069 (the “*David* Order”).

Plaintiffs submit the *David* Order for the Court’s consideration because it is directly relevant to the Motion and correctly articulates the reasons, discussed in greater detail in the Motion, why Mr. McAlear’s testimony should be excluded and Mr. McAlear’s report should be stricken from the record.

DATED: January 8, 2015.

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Respectfully Submitted,

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on January 8, 2015, a true and correct copy of the foregoing document was filed electronically with the Clerk of Court using the CM/ECF system, which will automatically send e-mail notification of such filing to all attorneys of record.

I FURTHER CERTIFY that U.S. Mail sent to the address of record for Global Resources, Inc. has been returned undeliverable, therefore I am unable to serve a copy of these pleadings on Global Resources, Inc. The last known address of Global Resources, Inc. is:

Global Resources, Inc.
c/o Michael Pol
13 Herring Road
Beaumont, MS 39423-2055

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